EXHIBIT "K"

NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION VIDEOTAPED DEPOSITION OF DEBRA SCHAMBERG, R.N. on 02/04/2015

Page 1

1	UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS						
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5	IN RE: NEW ENGLAND COMPOUNDING PHARMACY,						
6	INC. PRODUCTS LIABILITY MDL No. 2419 LITIGATION						
7	Master Dkt: 1:13-md-02419-RWZ						
8	THIS DOCUMENT RELATES						
9	TO:						
10	All Actions						
11							
12	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~						
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14	VIDEOTAPED DEPOSITION OF DEBRA SCHAMBERG, R.N.						
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16	9:06 a.m. February 4, 2015						
17							
18	Suite 1100						
19	315 Deaderick Street Nashville, Tennessee						
20							
21	Blanche J. Dugas, RPR, CCR No. B-2290						
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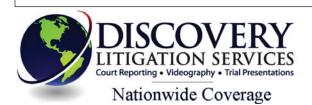


took our break, I believe you testified that the
primary reasons that you and or that St. Thomas
Neurosurgical switched from Clint Pharmaceuticals to
NECC were the shortage that you talked about and the
fact that NECC offered a truly preservative-free
version of MPA.

Now I'd like to talk about all the factors. What were all the factors that influenced St. Thomas Neurosurgical's decision to start buying from NECC?

- A. There was a factor of price. Clint

 Pharmaceuticals increased their price drastically and
 told me they would continue to increase it due to
 supply and demand.
- Q. So as I understand your testimony, before you decided to start buying from NECC, you knew that Clint Pharmaceuticals was increasing its price for generic MPA; is that correct?
 - A. That's correct.
- Q. And it increased its price by an amount of \$2.49 a vial; is that true?
- A. I'm not sure of the exact amount, but it was a substantial increase.
- Q. And I think when we look at some documents, we'll be able to pin that down. But am I correct in understanding that the day after you learned of Clint



1	Pharmaceuticals'	price	increase,	you	placed	your	first
2	order with NECC?						

- A. I don't know for sure. I'd have to look at the dates. I'm not...
- Q. But in any event, was it shortly after you learned of Clint Pharmaceuticals' price increase that you placed your first order with NECC?
- A. It wasn't mainly on the price increase. It was they did not -- couldn't guarantee me the supply that I needed.
- Q. The question was: Did you place your first order with NECC shortly after learning of Clint Pharmaceuticals' price increase?
 - A. Yes.

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- Q. And if Clint Pharmaceuticals had told you "We're going to increase our price by \$2.49 a vial, but we'll have enough for you, we'll meet your need," what would you have done?
- A. I don't know because that wasn't the -that wasn't the...
 - Q. All right. So we've talked about shortage, preservative-free, price. Any other factors that influenced the decision?
- A. Nothing that's coming to mind at the moment.

